

Exhibit B

From: Han, Suhana S.
Sent: Tuesday, August 13, 2019 1:33 PM
To: Joshua K. Bromberg
Cc: Arumugam, Myla G.; Miles, Christopher R.; Graham, Christopher A.; David Parker; Marc Rosen
Subject: RE: [EXTERNAL] RE: In re: Porsche 1782 - Protective Order and Definition of "Relevant Securities"
Attachments: 2019-08-13 S&C Proposed Search Terms for Requests 6 and 7.docx

And the attached contains our proposed search terms for Request Nos. 6 and 7. With respect to Request Nos. 1-5, as you know, they ask for "documents sufficient to show" or account statements, so we will not propose any search terms. Although we have no information about how Elliott maintains its records, we would expect certain relevant information would be found in Elliott's central recordkeeping systems and/or with custodians other than the three investment professionals you had identified as having primary responsibility for PSE and Volkswagen AG transactions. We are available to discuss scope and a reasonable process for searching for responsive documents.

Thanks, Suhana

From: Han, Suhana S.
Sent: Tuesday, August 13, 2019 1:22 PM
To: 'Joshua K. Bromberg'
Cc: Arumugam, Myla G. ; Miles, Christopher R. ; Graham, Christopher A. ; David Parker ; Marc Rosen
Subject: RE: [EXTERNAL] RE: In re: Porsche 1782 - Protective Order and Definition of "Relevant Securities"

Please find attached draft protective order, which reflects S&C's comments. Can we schedule call for end of day tomorrow or Thursday morning? Thanks.

From: Joshua K. Bromberg <JBromberg@kkwc.com>
Sent: Monday, August 12, 2019 2:04 PM
To: Han, Suhana S. <HanS@sullcrom.com>
Cc: Arumugam, Myla G. <arumugamm@sullcrom.com>; Miles, Christopher R. <MilesC@sullcrom.com>; Graham, Christopher A. <grahamch@sullcrom.com>; David Parker <dparker@kkwc.com>; Marc Rosen <mrosen@kkwc.com>
Subject: Re: [EXTERNAL] RE: In re: Porsche 1782 - Protective Order and Definition of "Relevant Securities"

Hi Suhana,

We are on the line but it doesn't appear that anyone from your team is on. Are we still having a 2pm call?

Joshua K. Bromberg
Kleinberg, Kaplan, Wolff & Cohen, P.C.
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Sent from my iPhone

On Aug 9, 2019, at 6:30 PM, Han, Suhana S. <HanS@sullcrom.com> wrote:

Thanks, have a great weekend.

From: Joshua K. Bromberg <JBromberg@kkwc.com>
Date: Friday, Aug 09, 2019, 6:05 PM
To: Han, Suhana S. <HanS@sullcrom.com>
Cc: Arumugam, Myla G. <arumugamm@sullcrom.com>, Miles, Christopher R. <MilesC@sullcrom.com>, Graham, Christopher A. <grahamch@sullcrom.com>, David Parker <dparker@kkwc.com>, Marc Rosen <mrosen@kkwc.com>
Subject: RE: [EXTERNAL] RE: In re: Porsche 1782 - Protective Order and Definition of "Relevant Securities"

Suhana,

Attached are a revised protective order and accompanying redline comparison of this draft to yours of August 2. Also attached is a revised definition of "Relevant Securities."

Elliott does not agree to the terms of the protective order or the definition of "Relevant Securities" and intends to object to them. While preserving all Elliott's objections, and without prejudice to (i) the Rule 72 objections currently pending before Judge Abrams; and (ii) the rights of Elliott, the Greenwich Plaintiffs and their affiliates to object to submission and use of any discovery materials in Germany, we have endeavored to craft a protective order and definition of "Relevant Securities" that are consistent with Magistrate Judge Aaron's rulings. We look forward to discussing these materials with you on Monday's call.

We also expect to be in a position to discuss the custodians issue with you on Monday.

Regards,
JKB

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From: Joshua K. Bromberg
Sent: Friday, August 09, 2019 11:22 AM
To: Han, Suhana S.
Cc: Marc Rosen; Arumugam, Myla G.; Miles, Christopher R.; Graham, Christopher A.; David Parker
Subject: Re: [EXTERNAL] RE: In re: Porsche 1782 - 4pm Conference

2 pm Monday works for us, thanks.

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On Aug 9, 2019, at 10:29 AM, Han, Suhana S. <HanS@sullcrom.com> wrote:

Okay, we can reschedule for Monday. How about 2pm? In addition to protective order, we'd like to discuss scope of discovery, including definition of Relevant Securities and proposed custodians. Thanks.

From: Joshua K. Bromberg

Sent: Friday, August 9, 2019 9:46 AM

To: Han, Suhana S.

Cc: Marc Rosen; Arumugam, Myla G.; Miles, Christopher R.; Graham, Christopher A.; David Parker

Subject: [EXTERNAL] RE: In re: Porsche 1782 - 4pm Conference

Suhana-

We suggest adjourning our meet and confer call until Monday. We can be available at almost any time that day. Please let us know a time that would work for you.

We had hoped to send you a markup of the protective order by now and still expect to be able to do so today. We have tried to address all of the open issues and believe we are doing so in a way that will be acceptable to you.

We therefore think a call on Monday will make more progress than if we proceed as scheduled this afternoon.

Thanks,
Joshua

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From: Han, Suhana S. [<mailto:HanS@sullcrom.com>]

Sent: Tuesday, August 06, 2019 6:12 PM

To: Joshua K. Bromberg

Cc: Marc Rosen; Arumugam, Myla G.; Miles, Christopher R.; Graham, Christopher A.; David Parker

Subject: RE: In re: Porsche 1782 - 3pm Conference

Okay, Friday at 4pm works for us. Thanks.

From: Joshua K. Bromberg <JBromberg@kkwc.com>

Sent: Tuesday, August 06, 2019 4:32 PM

To: Han, Suhana S. <HanS@sullcrom.com>
Cc: Marc Rosen <mrosen@kkwc.com>; Arumugam, Myla G. <arumugamm@sullcrom.com>; Miles, Christopher R. <MilesC@sullcrom.com>; Graham, Christopher A. <grahamch@sullcrom.com>; David Parker <dparker@kkwc.com>
Subject: [EXTERNAL] RE: In re: Porsche 1782 - 3pm Conference

Suhana,

Thursday does not work for us, but we can do Friday afternoon at 4pm.

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From: Han, Suhana S. [<mailto:HanS@sullcrom.com>]
Sent: Tuesday, August 06, 2019 4:11 PM
To: Joshua K. Bromberg
Cc: Marc Rosen; Arumugam, Myla G.; Miles, Christopher R.; Graham, Christopher A.; David Parker
Subject: RE: In re: Porsche 1782 - 3pm Conference

Are you available for meet and confer this Thursday at 4pm or thereafter? Per Judge Stewart's order of today, we'd like to negotiate scope of discovery, including definition of Relevant Securities, which we attached as Exhibit D to our letter motion. We'd also like to discuss Elliott's proposed custodians.

Thanks, Suhana

From: Joshua K. Bromberg <JBromberg@kkwc.com>
Sent: Tuesday, August 06, 2019 1:50 PM
To: Han, Suhana S. <HanS@sullcrom.com>
Cc: Marc Rosen <mrosen@kkwc.com>; Arumugam, Myla G. <arumugamm@sullcrom.com>; Miles, Christopher R. <MilesC@sullcrom.com>; Graham, Christopher A. <grahamch@sullcrom.com>; David Parker <dparker@kkwc.com>
Subject: [EXTERNAL] RE: In re: Porsche 1782 - 3pm Conference

Suhana,

As before, we'll plan to call you three minutes before the conference today. At what number can we reach your team?

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****This is an external message from: jbromberg@kkwc.com ****

This e-mail is sent by a law firm and contains information that may be privileged and confidential. If you are not the intended recipient, please delete the e-mail and notify us immediately.